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November 2, 2001

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: EX PARTE - CC Docket No. 01-277

Dear Ms. Salas:

Attached is written material concerning BellSouth's OSS and manual handling provided to the Department of Justice at their request.

I am filing notice of this ex parte in the docket identified above, as required by Commission rules, and request that you associate this notice with the record of that proceeding. If you have any questions concerning this, please call me at (202) 463-4182.

Sincerely yours,



Jonathan B. Banks

Attachment

cc: Jessica Rosenworcel
Susan Pié
James Davis-Smith (Department of Justice)
Cynthia Lewis (Department of Justice)

Flow Through BellSouth Compared to Verizon

	Verizon (PA)	Verizon (MA)	BellSouth
Resale	56%	46% to 49%	74% to 81%
UNE	54%	51% to 55%	58% to 69%
<i>UNE-P</i>	70%	<i>66% to 71%</i>	<i>64% to 80%</i>

Flow Through BellSouth Compared to SBC

	SBC (TX)	SBC (KS)	SBC (OK)	BellSouth
LEX/LENS	97% to 98%	89% to 91%	80% to 89%	81% to 90%
<i>Order</i>			<i>70% to 80%</i>	
EDI/EDI	98% to 99%	54% to 92%	89% to 95%	71% to 82%
<i>Order</i>		<i>61% to 97%</i>		
EASE	97% to 98%	92% to 96%	93% to 96%	
TAG				69% to 85%

***BellSouth Handles Rejects In a Manner Comparable
To or Better Than Other 271 Approved States***

Reject Results

SBC Texas (¶176)	30% LEX and EDI Orders	Range 10.8% to 60%
SBC Missouri	LEX 44% 12 month avg. EDI 24.8% 12 month avg.	
Verizon Massachusetts (¶175)	43 to 49% - Resale 21 to 25% - UNE	Range 5% to 83%
Verizon New York (¶175)	27 to 34% UNE	Range 3% to >70%
BellSouth-Georgia Mechanized and Partial Mechanized (August)	Resale – 14% UNE-P – 20%	Range Mechanized 5% to 27% Partial Mechanized 16% to 59%
TOTAL	July 19% August 21%	Non-Mechanized 13% to 60%

BellSouth Meets State Commission Benchmarks for Reject Timeliness

Reject Interval – Partially Mechanized Orders

***Benchmarks – 85% within 18 Hours May-July
85% within 10 Hours August***

Resale: Residence Business

May	97.51	98.14
June	94.50	96.11
July	95.50	95.26
August	96.90	94.90

UNE-P

May	97.69%
June	99.05%
July	98.34%
August	97.49%

BellSouth Meets State Commission Benchmarks for Reject Timeliness

Reject Interval – Non-Mechanized Orders

Benchmarks – 85% within 24 Hours

Resale: Residence Business

May	99.23	99.03
June	99.07	99.25
July	94.94	100.0
August	97.50	99.23

UNE-P

May	98.84
June	99.02
July	94.55
August	98.98

BellSouth Meets State Commission Benchmarks for FOC Timeliness

FOC Interval - Partially Mechanized Orders

***Benchmarks – 85% within 18 Hours May-July
85% within 10 Hours August***

Resale: Residence Business

May	97.26	96.26
June	93.50	96.10
July	95.82	95.28
August	94.52	92.39

UNE-P

May	97.45
June	98.56
July	98.66
August	97.99

BellSouth Meets State Commission Benchmarks for FOC Timeliness

FOC Interval - Non-Mechanized Orders

Benchmarks – 85% within 36 Hours

Resale: Residence Business

May	97.45	98.78
June	98.41	98.80
July	91.30	98.89
August	94.74	99.55

UNE-P

May	97.00
June	98.99
July	98.36
August	99.90

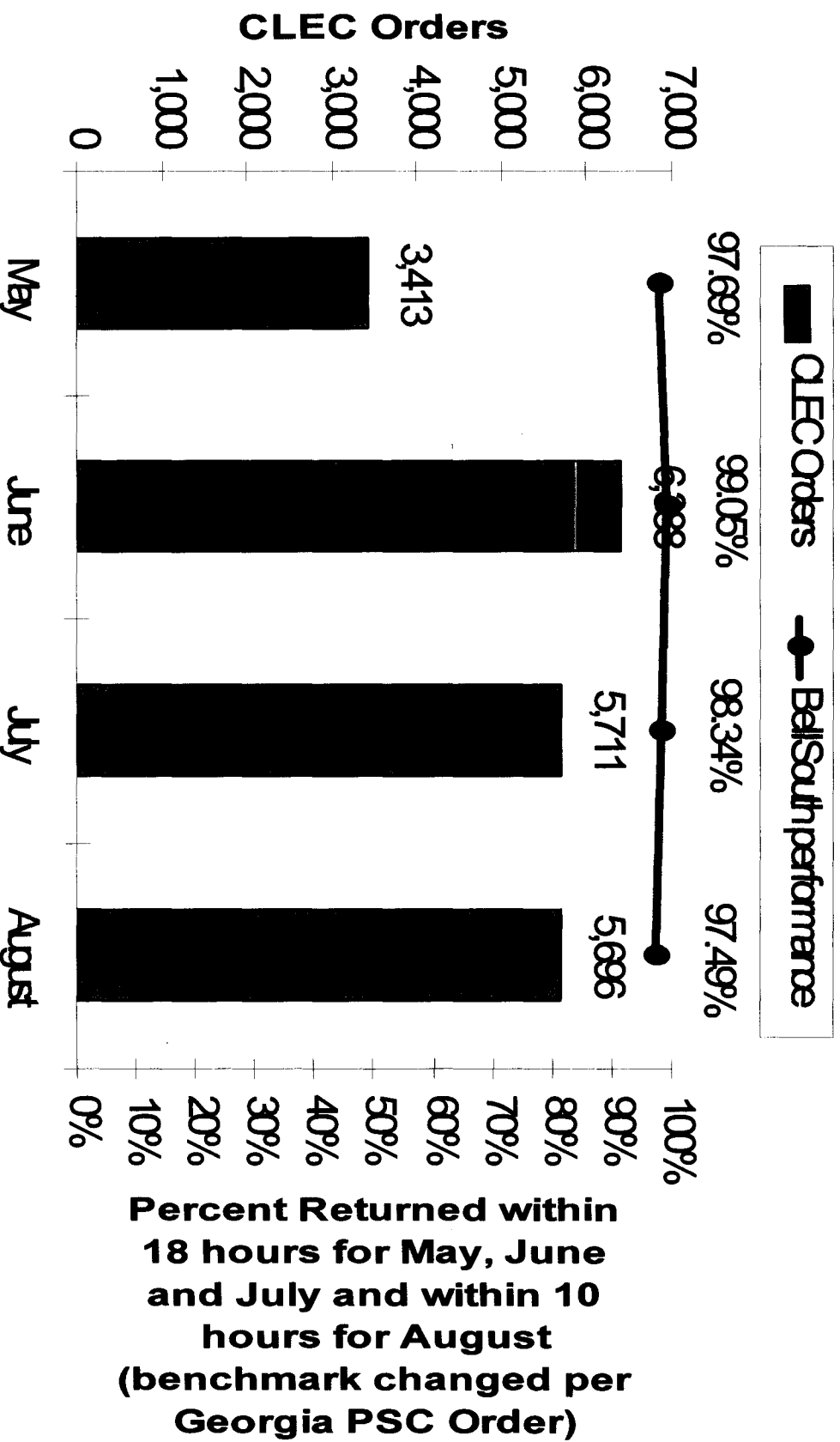
BellSouth's UNE-P Ordering Process Is More Efficient Than Other 271 Approved States

- **BellSouth uses a two order process, which involves a N (new) order and a D (disconnect) order.**
- **Georgia PSC found loss of dial tone issues to be less than .001% based on Worldcom's evidence. (page 135)**
- **SWB in Texas used a three order process that had address matching issues. CLECs alleged >5% loss of service at installation. Texas Commission found loss was minimal, and FCC agreed.**
- **SWB in Kansas also followed three order process, which it monitored through an exception reporting process.**

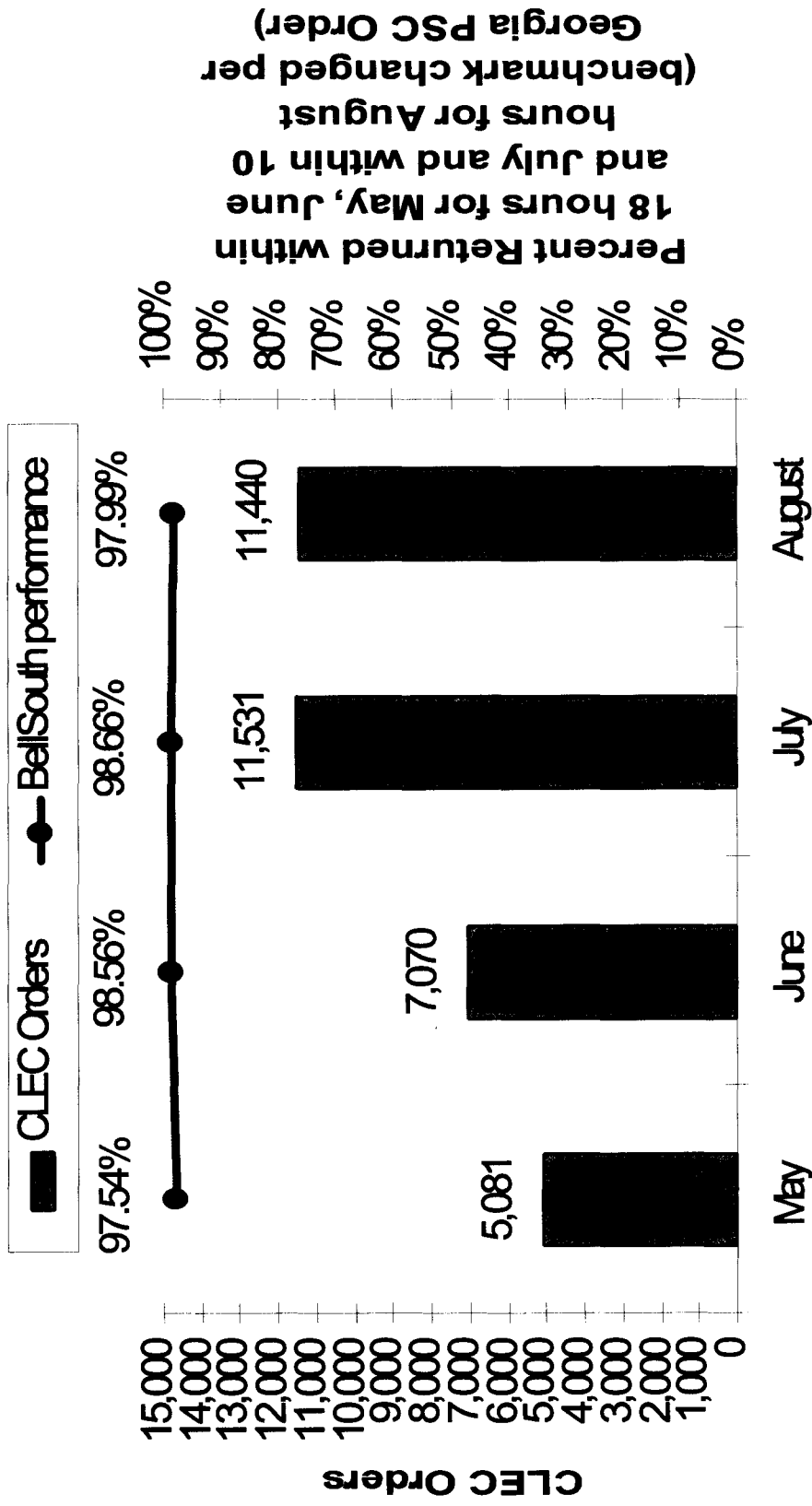
***Actual Commercial Usage Demonstrates that
BellSouth Can Scale Its OSS to Handle
Increasing Demand***

- From May through August, volume of UNE-P Orders grew from 16,000 to over 48,000 orders per month.
- In August, Benchmarks for Partial Mechanized Orders moved from 85% in 18 hours to 85% in 10 hours.
- Performance in critical areas for UNE-P continued at high level.

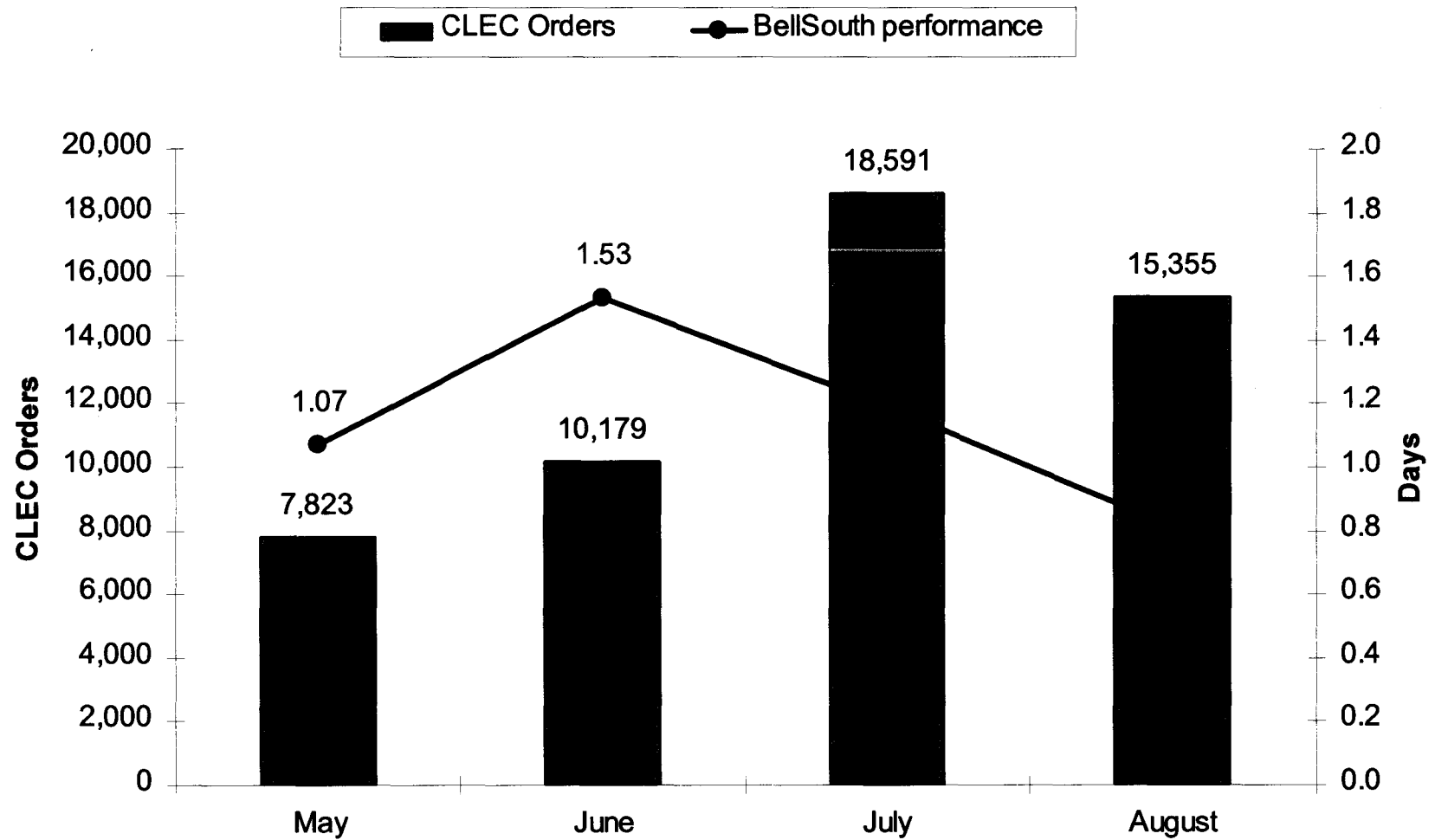
Reject Interval – Partially Mechanized – Loop + Port Combinations – Georgia



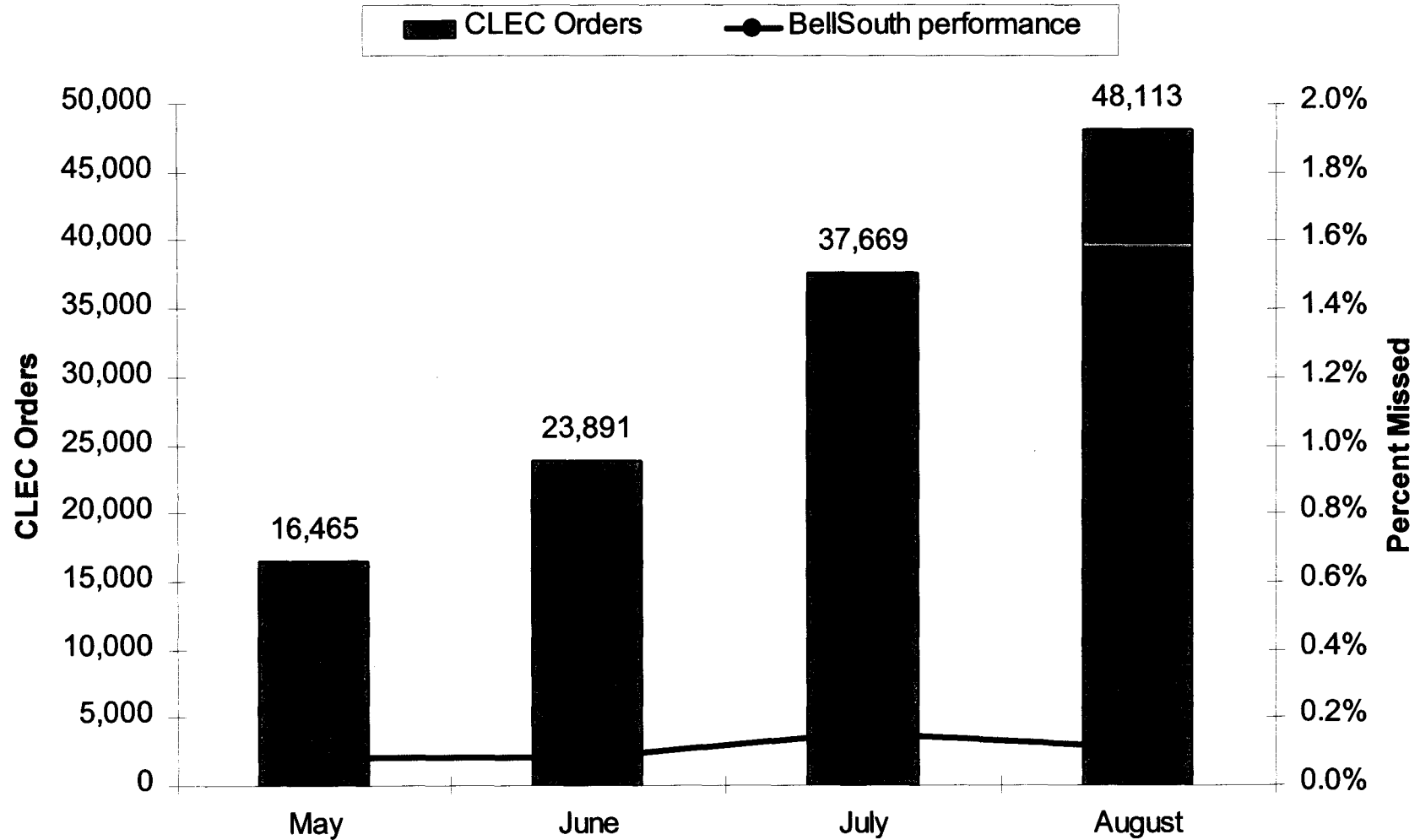
Firm Order Confirmation Timeliness – Partially Mechanized – Loop + Port Combinations – Georgia



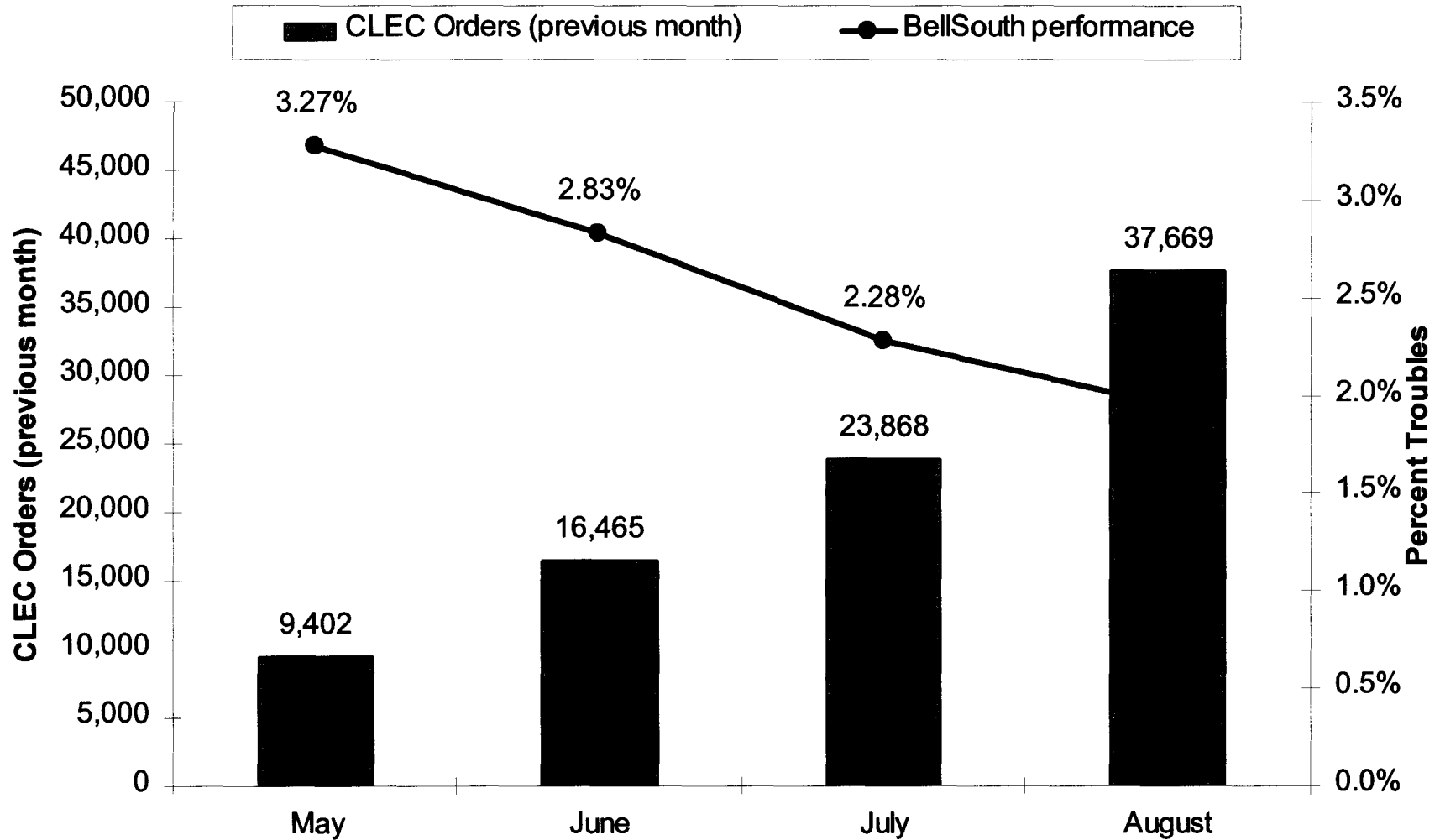
**Order Completion Interval –
Loop + Port Combinations/ <10 circuits/ Non-Dispatch –
Georgia**



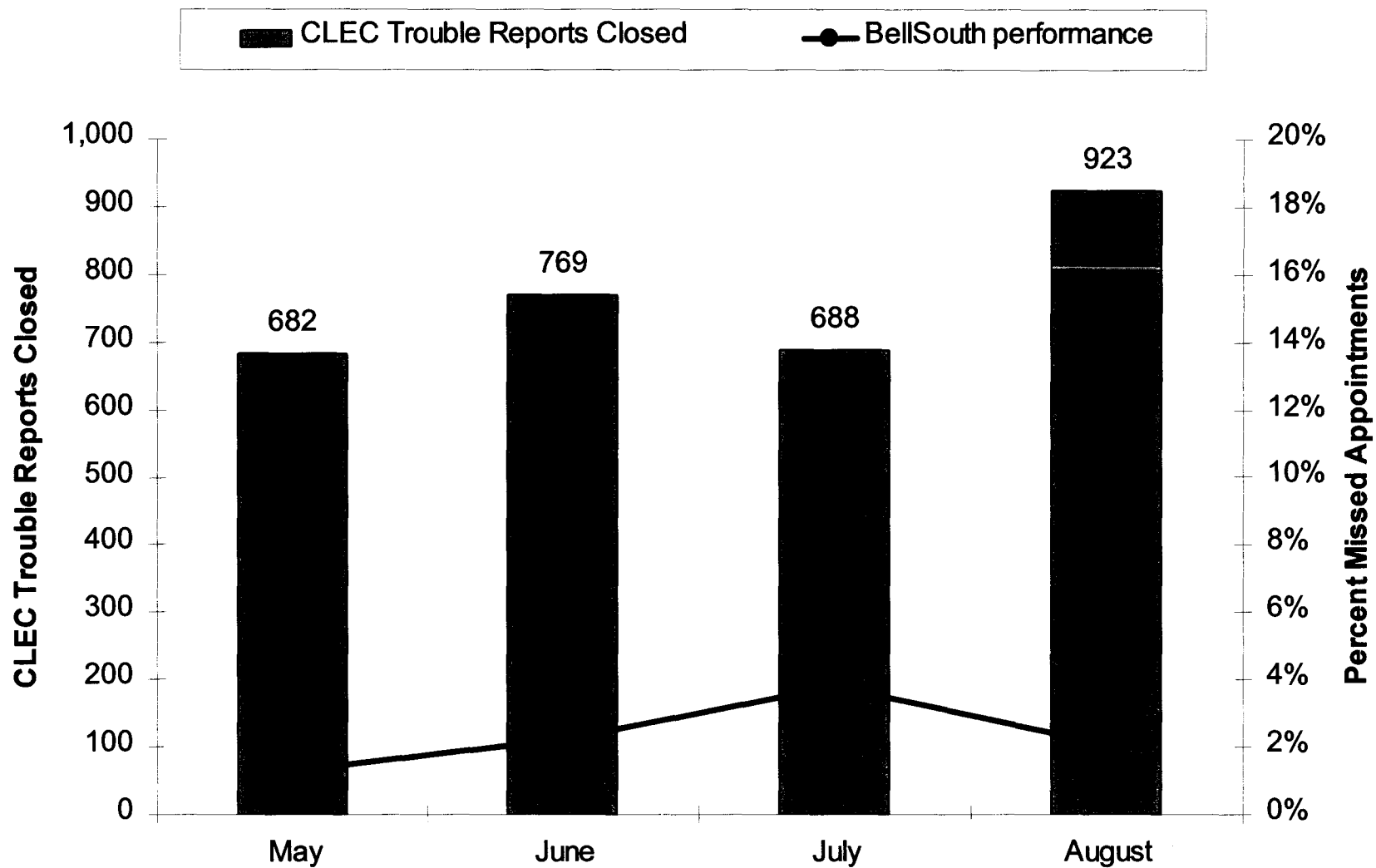
**% Missed Installation Appointments –
Loop + Port Combinations/ <10 circuits/ Non-Dispatch –
Georgia**



**% Provisioning Troubles within 30 Days –
Loop + Port Combinations/ <10 circuits/ Non-Dispatch –
Georgia**



Missed Repair Appointments – Loop + Port Combinations/ Non-Dispatch – Georgia



Maintenance Average Duration – Loop + Port Combinations/ Non-Dispatch – Georgia

